

IN THE CIRCUIT COURT
TWENTIETH JUDICIAL CIRCUIT
ST. CLAIR COUNTY, ILLINOIS

VERONICA SASENBURY,

Plaintiff,

vs.

BARNES JEWISH HOSPITAL d/b/a
CHILDREN'S HOSPITAL,

Defendants.

Case Number: 10 L L

SUMMONS

To each defendant:
Children's Hospital

One Children's Place
St. Louis, MO 63101

YOU ARE HEREBY SUMMONED and required to appear before this court at THE ST. CLAIR COUNTY COURTHOUSE, within 30 days after service of this summons, not counting the day of service. **IF YOU FAIL TO DO SO A JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.**

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service and not less than three days before the day for appearance. If service cannot be made, this summons shall be returned so indorsed.

This summons may not be served later than 30 days before the day for appearance.

(Seal of Court)

Witness January 12, 2010

Brendan F Kelly by J Malone
(Clerk of the Circuit Court)

(Plaintiff's attorney or plaintiff if he/she is not represented by an attorney)

Name: JAMES R. WILLIAMS #06206334
Attorney for: VERONICA SASENBURY
Address: 30 EAST MAIN STREET, P.O. BOX 565
City: BELLEVILLE, IL 62220
Telephone: (618) 235-1550
Fax: (618) 235-8059

EXHIBIT

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IN THE CIRCUIT COURT
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ST. CLAIR COUNTY, ILLINOIS

VERONICA SASENBURY,

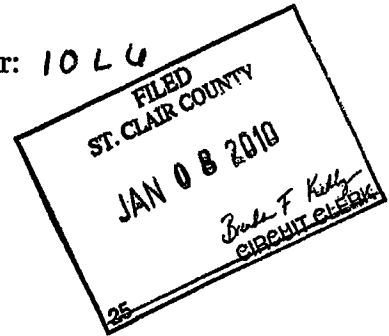
Plaintiff,

vs.

BARNES JEWISH HOSPITAL, d/b/a
CHILDREN'S HOSPITAL,

Defendant.

Case Number: 10 L 4



COMPLAINT
COUNT I

(Veronica Sasenbury vs. Barnes Jewish Hospital d/b/a Children's Hospital)

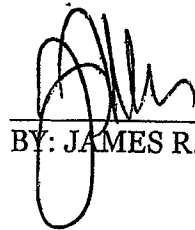
COMES NOW, the plaintiff, Veronica Sasenbury, by and through her attorney, James R. Williams of Williams, Caponi, Foley & Eckert, P.C. and for her complaint against the defendant, Barnes Jewish Hospital d/b/a Children's Hospital, states as follows:

1. That the plaintiff, Veronica Sasenbury is a citizen and resident of the State of Illinois and her date of birth is January 20, 1990.
2. That the defendant, Barnes Jewish Hospital d/b/a Children's Hospital is a medical facility located in the State of Missouri.
3. That on or about March 25, 2002 the plaintiff was a patient at Children's Hospital for the purpose of surgery for hyperparathyroidism.
4. That during said surgery, the plaintiff received third degree burns to her back.
5. That the defendant, Barnes Jewish Hospital d/b/a Children's Hospital was negligent in one or more of the following ways:

- a. The defendant negligently and carelessly allowed heat or some hot object to come in contact with the plaintiff during surgery causing burns to the plaintiff;
 - b. The defendant negligently and carelessly failed to properly supervise the preparation of the plaintiff for surgery;
 - c. The defendant negligently and carelessly failed to instruct or guide his assistants in the proper placement of surgical devices to avoid burning the plaintiff.
6. That the plaintiff, Veronica Sassenbury was injured in one or more of the following ways:
- a. The plaintiff has endured additional surgery including a debridement of the burned area;
 - b. The plaintiff has suffered disfigurement and disability;
 - c. The plaintiff has expended money for necessary medical care, treatment and services and will be required to expend money for medical care, treatment services in the future;
 - d. The plaintiff has suffered disability as a result of his injuries;
 - e. The plaintiff has experienced pain and suffering and will be reasonably certain to experience pain and suffering in the future as a result of his injuries.

WHEREFORE, the plaintiff, Veronica Sassenbury prays this Court enter an Order granting judgment against the defendant, Barnes Jewish Hospital d/b/a Children's Hospital in an amount in excess of Fifty Thousand Dollars plus the costs of this suit.

RESPECTFULLY SUBMITTED,



BY: JAMES R. WILLIAMS #06206334

LAW OFFICES

Williams, Caponi, Foley & Eckert, P.C.
30 East Main Street
PO Box 565
Belleville, IL 62220
(618) 235-1550
fax: (618) 235-8059

DEFENDANTS TO BE SERVED:

Children's Hospital
One Children's Place
St. Louis, MO 63101

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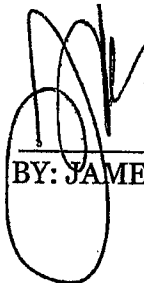
Defendants.

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AFFIDAVIT

COMES NOW, James R. Williams of Williams, Caponi, Foley & Eckert, P.C.,
attorney for the plaintiff in the above-entitled action and at the time of filing of this
Complaint has reasonable grounds to believe that the damages to the Plaintiff as a result
of the injuries sustained herein will be in excess of Fifty Thousand Dollars (\$50,000.00)

1/7/2010
DATE


BY: JAMES R. WILLIAMS #06206334

LAW OFFICES

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Belleville, Illinois 62222
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VERONICA SASENBURY,

Plaintiff,

vs.

Case Number: 10 L 6

BARNES JEWISH HOSPITAL, d/b/a
CHILDREN'S HOSPITAL,

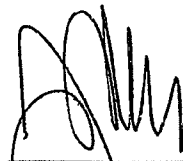
Defendant.

AFFIDAVIT IN COMPLIANCE WITH 735 ILCS 5/2-622
NINETY (90) DAY AFFIDAVIT

The undersigned, James R. Williams, is an attorney in good standing in the State of Illinois, has an office located in Belleville, Illinois and has filed a Complaint to which this affidavit is attached and made a part hereof the affiant further states:

1. That counsel for plaintiff has diligently sought medical records and review, but has not found an expert to date.
2. That counsel for plaintiff has been unable to comply with the provisions of 735 ILCS 5/2-622(1) due to the above.
3. As provided in 735 ILCS 5/2-622(2) the undersigned hereby states that the required consultation could not be obtained or the action would be impaired by the running of the statute of limitations.

Further, the affiant sayeth not.



JAMES R. WILLIAMS

Subscribed and sworn to before me this 1 day of January, 2010.


NOTARY PUBLIC

